State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/782-6762

MAY 9, 1997 WASTE STREAM/AUTHORIZATION NUMBER 970248
APPLICATION RECEIVED: 05/06/97 PERMIT EXPIRES: 05/07/99
PERMIT ISSUED TO:

CID RDF
138TH ST & CALUMET EXPWY
CALUMET CITY , IL
60409

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138TH ST & CALUMET EXPWY
CALUMET CITY , IL
60409

WASTE NAME: BLACK TAR SUBSTANCE OF UNKNOWN
WASTE CLASS #2 NON-HAZ NOT SUBJECT TO PBS

PERMIT TO RECEIVE THE INDICATED WASTE IS GRANTED.

RECEIVING FACILITY NAME: CID RECYCLING & DISP FAC
IEPA FACILITY NO.: 0316000037

DISPOSITION OF WASTE: 25
BULK OR CONTAINERIZED MIXED WITH DAILY REFUSE

WASTE TREATMENT:

STORAGE:

ATTENTION: MARK J LEIBROCK IEPA GENERATOR NO.: 0316000025
WASTE GENERATOR: INTERLAKE LANDFILL
116TH & TORRENCE
CHICAGO IL
60617

THIS PERMIT IS GRANTED SUBJECT TO THE ATTACHED STANDARD CONDITIONS AND ANY SPECIAL CONDITIONS LISTED BELOW.

1. THE PERMITTEE SHALL NOT DISPOSE OF ANY WASTE OTHERWISE AUTHORIZED FOR DISPOSAL BY THIS PERMIT IF SUCH WASTE IS A LIQUID WASTE AS DETERMINED BY 35 ILL. ADM. CODE 729.328.

Edwin C. Bakowski

LWB:SAS
CC:INTERLAKE LANDFILL
REGION: MAYWOOD

EDWIN C. BAKOWSKI, P.E.
MANAGER, PERMIT SECTION
BUREAU OF LAND

970248 5/27/99

MIDWEST REGION
SPECIAL WASTE MANAGEMENT DECISION

WMNA 194139
Waste Profile Sheet Code

I. **Request For Decision:** X Initial ___ Renewal

GENERATOR NAME Waste Management of Illinois Inc ADDRESS Stony Island Avenue at 118th St

CITY STATE/PROVINCE Chicago IL 60617

WASTE NAME(S) Black Tar like Material of unknown origin

PROPOSED MANAGEMENT FACILITY CID

PROPOSED INTERMEDIATE TRANSFER FACILITY ___ TRANSPORTER GEN #

WMNA REQUESTOR Kelly Clancy SIGNATURE 031600025

II. **TECHNICAL MANAGER DECISION: (circle one)** APPROVED DISAPPROVED ___ Check if additional information is attached

If Disapproved, Explain

If Approved, Complete A, B, C and D Below

ENTERED

A Management Method(s) 25 Codisposal

B Precautions, Conditions, or Limitations on Approval Obtain an IEPA Special Waste Permit prior to management. Material must pass the paint filter test

C **Decision Expiration Date:** 3yrs TBJ

D For Type A Wastes, Laboratory Analysis of a Representative Sample Was (Check only one)

___ Waived ___ Supplied By Generator ✓ From a WMI-Approved Lab ___ From Both Generator and WMI-Approved Lab

TECH MGR SIGNATURE Peter G Johnson NAME (Print) Peter G Johnson DATE 4/27/99

III. **WMI MANAGEMENT FACILITY GENERAL MANAGER DECISION: (circle one)** APPROVED DISAPPROVED

If Approved, State any Additional Precautions, Conditions or Limitations None

GENERAL MGR SIGNATURE Kurt Nebel NAME (Print) Kurt Nebel DATE 2/7/'97

IV **WMI INTERMEDIATE TRANSFER FACILITY GENERAL MANAGER DECISION (circle one)** APPROVED DISAPPROVED

If Approved, State any Additional Precautions, Conditions or Limitations

GENERAL MGR SIGNATURE ___ NAME (Print) ___ DATE ___

WMX TECHNOLOGIES, INC.
DIRECTIVE: ED-111

SPECIAL WASTE PROGRAM

ISSUED: March 1, 1992
REVISED: September 27, 1996

AUTHORIZED BY: WMX Chief Environmental, Health, and Safety Officer

1.0 PURPOSE

Waste Management, Inc. (WMI) recognizes that its position as industry leader creates a responsibility for leadership in self regulation, and this responsibility includes the appropriate management of all waste entrusted to the Company's care. The Company also recognizes that certain Federal, Canadian, Mexican, State, Provincial, and local regulations may need to be supplemented by an internal control program which ensures that all waste streams receive attention commensurate with the risk associated with managing the waste. In addition to hazardous waste, some non-hazardous wastes from commercial and industrial customers require special handling. The company considers many of these streams to be "Special Waste."

The Special Waste Program applies to WMI, AETS, and Technology Services (except CNSI) North American operations and is designed to utilize communication and teamwork between the generator, hauler, disposal/management facility operators, and inspectors to identify commercial and industrial wastes that require special handling from a regulatory, environmental, and/or employee-safety perspective. Implementation of the Special Waste Program will:

- Provide protection from the potential dangers that special waste could pose to our employees, the public, or the environment through improper management,

- Serve as a hazardous waste, PCB, and radioactive screening mechanism that assures that these waste streams are properly managed, and

- Minimize the customers' and Company's potential liabilities.

The sections of this document that are shown in non-italicized print detail the Special Waste Program requirements. The *italicized* sections present additional technical and procedural information to aid in the understanding and implementation of the Special Waste Program. All information in the Appendices are not requirements unless otherwise stated.

The Special Waste Program does not impact the management of residential waste other than making employees more conscious of environmental and safety concerns associated with managing this waste. Compliance with the Special Waste Program ensures compliance with the waste screening requirements of the Federal Subtitle D regulations (40 CFR Part 258.20(a)(1)-(3)) but does not necessarily ensure compliance with similar Canadian or Mexican, State, Provincial or local requirements. **WMI Groups are responsible for supplementing this guidance document as necessary to ensure compliance with local/regional environmental requirements.**

2.0 EFFECTIVE DATE

This Directive is effective December 2, 1996. This document replaces the ED-111, "Special Waste," dated March 1, 1993; Special Waste Guidance dated April 27, 1992; and ED-150, "CWM Waste Acquisition and Management Procedures Manual," dated July 23, 1993.

3.0 APPLICABILITY

The Special Waste Program applies to WMI, AETS, and Technology Services (except CNSI) North American operations. This Directive is applicable to all landfills, hauling companies, transfer stations, medical waste, treatment, storage and disposal facilities (TSDFs) and material recovery divisions and all special waste (as defined in Appendix 10.1) produced by WMI or its customers, including special waste hauled by non-WMI transporters, brokered by third parties, or transported to a WMI facility by customers.

4.0 SPECIAL WASTE PROGRAM

4.1 SPECIAL WASTE IDENTIFICATION

4.1.a Special Waste Identification Program

Each Group must assure that its divisions have a special waste identification program that identifies special waste produced by the divisions and received from their commercial and industrial customers. All wastes managed at a Subtitle C facility are Special Wastes.

4.1.b Prohibited Wastes

WMI non-hazardous operating divisions shall not transport or manage hazardous wastes, radioactive wastes, asbestos, or regulated polychlorinated biphenyl (PCB) wastes for their customers without prior, written approval from the Group Environmental, Health, and Safety Vice President (EH&S VP).

4.1.c Other Commercial Waste

All wastes from commerce that are not special wastes are managed in the same way as municipal refuse. Regular household refuse is considered special waste only when a commercial activity, such as asbestos removal, building fumigation, or household hazardous amnesty programs, has produced a special waste.

Products, which, if wastes, would be included in the definition of special waste are not considered special wastes as long as the materials are accepted at the facility solely for use as a product and not ultimately disposed of at the facility. These materials may be used only after written approval has been obtained from the Special Waste Approvals Person (SWAP) that outlines the acceptable uses of the material, determines that the proposed use of the material is not prohibited by permit or regulation, and documents (possibly through review of analytical data or safety information) that the material will not be harmful to the environment, the facility, or the employees.

4.2 SPECIAL WASTE MANAGEMENT DECISION PROCESS

4.2.a State Programs for Handling Non-Hazardous Wastes

A hazardous waste, PCB, or radioactive waste screening program approved by the USEPA as part of a state's Subtitle C or D program can be used in place of the WMI Special Waste Program. The Group EH&S VP, along with Group Counsel, must assure that the state program provides equivalent protection to customers, employees, and the environment and that a management system is in place at all affected WMI facilities to properly implement the state program.

4.2.b WMI Special Waste Program

A decision to approve or disapprove management of special waste shall be clearly documented for each special waste stream (customer — as well as WMI-generated special waste) that WMI is requested to manage. At a

minimum, the following requirements must be met before WMI facilities manage special waste:

- The customer must provide information about the waste and sign the "Generator's Waste Profile Sheet" (GWPS; refer to Section 4.3.a, "Mandatory Paperwork").

- The generator must also submit a representative sample, if required by the SWAP or facility Waste Analysis Plan (WAP), along with the profile. The sample must be:
  i) Representative of the waste stream;
  ii) Sufficient in quantity to conduct required analysis;
  iii) Current (i.e., no more than 180 days from the date of sampling, or less if analytically required);
  iv) Physically consistent with the waste described on the profile;
  v) Marked to clearly identify the profile that corresponds to the sample; and
  vi) Signed and dated by the sampler.

  If the generator has conducted an analysis of the waste stream, the analysis report may be submitted instead of a sample (Refer to Section 4.4.b Analytical Requirements).

- A Special Waste Approvals Person must review the GWPS and associated information, ensure that analytical information meets the requirements of section 4.4, assign necessary precautions, conditions, or limitations on managing the waste, and complete the decision process.

  It is a recommended that Material Safety Data Sheets pertaining to the waste stream be included with the GWPS documentation, where available.

  The WMX Corporate Sales & Marketing Department has personnel available to assist and coordinate national, regional, or individual special waste decisions.

- A renewal date for the GWPS must be assigned and must not exceed five years or the expiration date of the service agreement or state approval, or as specified in a facilities Waste Analysis Plan, whichever is less.

- The WMI division (or Customer Service Center) must ensure that a service agreement is completed with the customer, in accordance with Directive CD-102, inform the customer in writing (e.g., a copy of the approved profile sent to the customer) of all precautions, conditions, or limitations that apply to managing the waste, and comply with all such precautions, conditions, or limitations.

It is imperative that the decision process be completed as expeditiously as possible to properly service the customer. This requires all employees responsible for portions of the process to efficiently perform their responsibilities and to communicate their needs and difficulties to the others involved in the decision process.

4.2.c Generic Special Waste Management Decisions

To further improve efficiency of employees and enhance customer service, Special Waste Approvals Personnel should develop generic Special Waste Management Decisions, wherever practical, for physically and chemically consistent special waste streams managed in similar ways. Using generic decisions can decrease the time needed to approve a customer's waste stream without increasing risk.

4.2.c.i Non-Hazardous Waste

The minimum requirements in section 4.2.b for making a special waste decision must be adhered to when making generic decisions.

4.2.c.ii Hazardous Waste

4.2.c.ii.a Establishment of a Generic Waste Stream

A generic profile may be developed using historical data and at least one profile and analysis within the current time frame established by the receiving TSDF's Waste Analysis Plan. If historical data is not available or reliable, a database must be developed by testing samples of the generic waste stream. At least five historical or present analysis reports/profiles must be used to develop a generic waste stream profile. A generic waste stream profile must be identified by a unique identification number consisting of a 3-digit site code followed by a 3-digit serial number (i.e., MDC001), and all sections of the profile will be completed except for generator specific information and the "Generator's Certification."

The SWAP must follow the approval as required in Section 4.2.b. The generic waste stream package must be forwarded to the receiving TSDF for reference before approving any generator specific wastes under the generic.

4.2.c.ii.b Approval of Generator Specific Waste Streams Under a Generic Waste Stream

A specific waste stream is identified as conforming to an approved generic waste stream by evaluating the specific waste stream information against the generic waste stream profile and information ranges. This evaluation may be conducted by SWAP, Sales, Customer Service, or Field Personnel provided the person has been trained in the use of generic waste stream profiles.

A waste profile with generator specific information must be completed. The generic profile is a template. The generator profile developed from a generic must be "customized" by the removal of waste codes or by narrowing the ranges of the chemical or physical characteristics and the waste must not change regulatory status (e.g., RCRA to non-RCRA, non-TSCA to TSCA). No additions may be made to a generic profile in order to accurately describe a specific generator's waste stream. It is the generator's waste profile that is customized, not the generic.

Each generator specific profile must have an approved generator specific waste management decision before managing the waste.

4.2.c.ii.c M aintenance of Generic Waste Streams

Annual review will be conducted by SWAP to ensure the technical accuracy and efficient operation of the generic waste stream process. Generic waste stream profiles/decisions must be re-evaluated as required by the receiving TSDF's WAP.

4.2.d Special Waste Decision Renewal Process

Prior to the renewal date of a Generator's Waste Profile Sheet, the underlying facts concerning the waste stream must be re-examined and a decision rendered according to section 4.2.b whether to continue managing the wastes and whether expanded service is required.

In order to maintain the same waste profile number upon recertification, for waste streams that have not changed since they were initially profiled, a GWPS is available without a preprinted profile number. If the information has not changed, the new GWPS must reference the expiring GWPS and include all required approvals and should be attached to or filed with any information the new GWPS references. Alternatively, a new GWPS may be completed (in order to update the information on the profile as long as the waste characterization or precautions, special handling procedures, or limitations do not change).

A representative sample shall be collected and analyzed if the SWAP determines that it is needed to properly characterize the waste or as required by the facility WAP.

The service agreements should be reviewed as part of making the renewal decision to ensure that they are complete

and accurate.

4.3 SPECIAL WASTE PAPERWORK

4.3.a Mandatory Paperwork

The special waste forms listed below (or equivalent forms approved by the Group EH&S VP and Group Counsel) must be completed for all special waste streams managed by WMI divisions.

- "Generator's Waste Profile Sheet" (Form WMI-SW or WMI-HW), dated 09/96 or most current version, or
- "Waste Information Profile" from Advanced Environmental Technical Services, most current version, or
- Waste Profile Sheet generated through the AS400 system,

AND

- "WMI Service Agreement", per Directive CD-102.

The mandatory paperwork listed in the first three bullets above are collectively referred to in this document as Generator's Waste Profile Sheets (GWPS).

4.3.a.i Generator's Waste Profile Sheet (GWPS)

The GWPS must be completed and signed by the customer for all special waste streams. WMI employees shall not complete the GWPS for the customer but may offer assistance.

Each WMI Division is responsible for completing a GWPS for all site-generated special wastes.

4.3.a.ii Service Agreement

Prior to WMI managing special waste, a service agreement must be completed in accordance with CD-102. Alternatively, special waste may be managed under a WMI national or regional contract or franchise agreements between WMI and public entities (e.g., cities and counties).

A WMI Service Agreement is not required to be signed for waste streams that are managed intercompany.

4.3.b Other WMI Paperwork

The paperwork listed below may need to be used in order to approve the GWPS and properly manage the customer's waste.

4.3.b.i Non-WMX Facility Use Decision

A non-WMX facility approval is required to be completed according to the non-WMX Directive (ED-109) and maintained in the division files for WMI divisions that are sending special waste to a non-WMX ultimate management facility.

Non-WMX facilities (except for National Agreements that include indemnification, e.g., Safety-Kleen, Interstate Battery) proposed for managing WMI-generated wastes must be approved in accordance with the non-WMX Directive ED-109.

Non-WMI reviews of publicly owned wastewater treatment facilities (POTWs) that manage, through hardpiped

hookup, WMI's site-generated liquid waste are not necessary. Instead, compliance with pretreatment and/or other standards imposed by the POTW is necessary. Documentation of and compliance with these requirements must be maintained in readily accessible files.

4.3.c Changes or Additions to Paperwork

4.3.c.i Non-Hazardous Waste

All changes made to the written information provided by the customer must be initialed and dated by the WMI personnel making the changes. *When practical, the customer should acknowledge these changes by initialing and dating in proximity to the changes.*

Changes made to information provided by WMI personnel must be initialed and dated by the WMI personnel making the changes. If these changes affect the precautions, conditions, or limitations of the Special Waste Management Decision, the SWAP, affected divisions, and customer must be informed in writing of the changes.

4.3.c.ii Hazardous Waste

4.3.c.ii.a Evaluation of the Profile and Sample Analysis

Modifications to profile information may be required as a result of the laboratory analysis or review. Special Waste Approval Personnel can make changes or additions to the information supplied on the generator completed profile and waive the need for certain information, if allowed by the receiving facility's WAP. Special Waste Approval Personnel may complete the portions of the profile that are left blank if the missing information can be accurately determined. The profile information will be deemed acceptable by the generator upon scheduling and/or shipping the waste to the receiving TSDF.

4.3.c.ii.b Changes to a Generator's Waste Profile Sheet

Any changes made by the receiving TSDF's personnel to a GWPS profile after the waste has been approved must be communicated to the SWAP in writing by documenting on the Profile Change Log using Lab Asystant or on the current hard copy of the profile. The SWAP may also initiate changes to the GWPS. It is the SWAP's responsibility to determine if the change affects a single TSDF or multiple TSDF's. The SWAP must communicate all changes to parties requiring profile information.

As part of the modification process, Special Waste Approval Personnel must:

i) Determine whether the information received warrants temporary suspension of the special waste approval;
ii) Obtain any necessary supporting information from the generator;
iii) Determine whether supporting information warrants modification or revocation of the GWPS, or issuing a new GWPS; and
iv) Document the decision if no change is needed.

If a Special Waste Approvals Person decides to suspend, revoke, or issue a new GWPS, the WMI division(s) approved to accept the waste stream, Sales, and Customer Service must be notified in writing. It is the responsibility of Sales or Customer Service to notify the customer.

4.3.c.iii Service Agreements

Deviations from standardized service agreements must be done in accordance with CD-102.

4.4 LABORATORY USAGE

4.4.a Acceptable Laboratories

The following laboratories, listed in order of preference, are acceptable for conducting analyses of special waste:

- A WMX-owned laboratory.
- Laboratories on the WMX Subcontract Laboratory List.
- A commercial or private laboratory, using SW-846 or equivalent approved test methods, that is acceptable to the SWAP.

  It is recommended that state-certified labs be used whenever practical, and that state certification be documented to ensure that the laboratory is certified to analyze a given waste stream and to conduct an entire test method, not just a portion of the method.

4.4.b Analytical Requirements

The Special Waste Approval Person shall determine the analytical information (if any) necessary to make a Special Waste Management Decision. In making their determination, SWAP must evaluate the health and safety of employees, the effect on the equipment used to manage the waste, and potential for a release (e.g., into the leachate) and, where applicable, evaluate the proposed TSDF's WAP requirements. This evaluation may apply to several facilities if the waste will be approved at multiple facilities.

Analyses must have been conducted within the SW-846 holding times for the parameters to be analyzed, but not to exceed 180 days from the sampling date. If additional laboratory or analytical information is required, the generator may be contacted to provide this additional information or WMI may perform the required analysis.

If an analysis report is submitted instead of a sample, the SWAP must evaluate the analysis report and ensure it meets all requirements to complete a GWPS (refer to Section 4.4.d).

Appendix 10.3 includes recommended analytical information for some special waste streams. This information is provided to assist WMI employees in making proper requests for analyses, not to act as an exhaustive list of necessary analyses. Appendix 10.3 should be supplemented to account for Mexican, Provincial, state and/or local requirements and the unique situation under consideration.

Any time a WMI non-hazardous operation is requested to conduct dioxin sampling or analysis, approval must be obtained from the Group EH&S VP before committing to conducting the sampling or analysis. Consistent with the Variance Directive, if dioxin sampling or analysis is required by permit or State/Provincial or local regulations, Group EH&S VP approval is not needed. All dioxin analyses that are to be performed for WMI must be done by a third party rather than being performed internally. *The Group EH&S VP should be informed that dioxin testing is being conducted.*

4.4.c Waiving Analytical Requirements

Special Waste Approval Personnel may waive analysis for special waste in the situations below.

- The generator has demonstrated satisfactory knowledge of the waste stream and the process generating the waste to ensure the Special Waste Approvals Person that the waste stream is accurately represented. *SWAP should also consider the generator's knowledge to ensure that the waste will not be harmful to the management facility and will not create difficulties for operations or future leachate treatment/disposal*
- The GWPS is being renewed and the waste, the process generating the waste, the analytical methods, the applicable regulations, and limits for the constituents-of-concern in the waste have not been reduced since the initial approval was granted.

- In the case of a hazardous waste, the WAP allows analyses to be waived.

- A partial waiver of analytical requirements (e.g., to only conduct TCLP metals rather than a full TCLP test) may be granted when the SWAP determines that specific constituents could not be present in the waste at a regulated level.

- Site-generated leachate and gas condensate must be managed as special waste, but TCLP results are not required if the wastes are designated as F039 or are managed by one of the following methods:

  - Sewer discharge to a POTW.

  - Point source discharge subject to regulation under section 402 of the Clean Water Act.

    Leachate and gas condensate that is managed by direct discharge to a POTW/sewer or through an NPDES permit must comply with all pretreatment, permit conditions and other applicable requirements.

  - If the special waste is also a hazardous waste subject to Part 268 Land Disposal Restrictions, a one-time notification pursuant to 268.7(a)(6) must be placed into the facility's files.

4.4.d Analytical Reports

Analytical reports must clearly identify the:

- Generator
- Date when analysis was conducted,
- EPA (or other authoritative source) Method;
- Reporting limit;
- Specific analytes tested and results;
- Sample management information; and
- Laboratory Approval signature.

4.4.e Representative Samples

WMI divisions should base Special Waste Management Decisions on samples collected in accordance with 40 CFR 261.20(c) or equivalent U.S., Mexican, or Canadian Federal, State/Provincial, or local rules.

4.5 OPERATIONAL REQUIREMENTS FOR SUBTITLE D LANDFILLS

Spotters or other WMI employees trained in the identification of special waste must be present at the active face at all times that special waste is unloaded to check for peculiarities (e.g., hot loads, sludges with high liquid content) in the waste stream.

WMI landfills shall not dispose of chemotherapeutic waste unless specifically permitted and the waste is properly packaged.

A landfill grid system is recommended for Subtitle D facilities to document the disposal location of special waste loads.

5.0 RESPONSIBILITIES

The responsibilities listed below are mandatory, while the authorities listed are discretionary. The indicated

individuals may delegate their authority as needed to properly and efficiently administer the Special Waste Program. A list of authorities delegated to employees not specifically referenced in this guidance document must be documented and filed at the Group office.

5.1 Division President (DP)

Responsibilities

- Manage and implement the Special Waste Program for assigned division(s) or Customer Service Center(s).
- Identify special waste produced by the division and commercial and industrial customers.
- Comply with special waste approvals.
- Compliance with Directive CD-102, Customer Service Agreements.
- Ensure compliance with this Directive and related U.S., Mexico, Canadian Federal, State/Provincial, and local requirements.

Authorities

- *Delegate (in writing) appropriate staff to carry out the responsibilities listed above.*
- *When necessary, request variances or emergency relief from the Special Waste Program in accordance with section 6.0.*

5.2 Special Waste Approvals Person (SWAP)

Responsibilities

- Implement applicable sections of the Special Waste Management Decision Process described in section 4.2 in accordance with applicable requirements and as expeditiously as practicable.
- Carry out related duties as assigned (e.g., arrange for laboratory analyses of special waste).
- Evaluate the use of waste materials as products by WMI facilities (e.g., slag used as road aggregate) in accordance with section 4.1.c.

Authorities

- *Approve, where appropriate, Generator's Waste Profile Sheets in accordance with Section 4.2.*
- *When necessary, request variances or emergency relief from the Special Waste Program in accordance with section 6.0.*
- *Modify, suspend, or revoke a GWPS, if necessary.*

5.3 Group President (GP)

Responsibilities

- Manage and implement the Special Waste program in the Group.

Authorities

- *Grant emergency relief from the Special Waste Program in accordance with section 6.3.*
- *In conjunction with the Group Environmental, Health, and Safety Vice President, establish supplemental policies and procedures, as needed, to ensure appropriate management of special waste within the Group.*

5.4 Group Environmental, Health, and Safety Vice President (EH&S VP)

Responsibilities

- Designate Special Waste Approvals Personnel.
- Manage the technical, health, safety, transportation, and compliance aspects of the Group's Special Waste Program to ensure that special waste approvals are made in accordance with program requirements.
- Provide training materials and train-the-trainer courses in accordance with section 7.0 to ensure that employees who are authorized are capable of consistently making proper special waste approvals. Group EH&S VPs may rescind any WMI employee's authority to approve GWPS if the employee fails to demonstrate the continued ability to make decisions that are consistent with the Special Waste Program requirements.
- Review and grant decisions on variance requests in accordance with section 6.2.
- Assess potential liabilities in using non-WMX facilities to manage special wastes.
- Approve WMI non-hazardous operating divisions within their Group to transport or manage hazardous wastes, radioactive wastes, asbestos, or regulated polychlorinated biphenyls (PCBs).

Authorities

- *Provide guidance to Group employees on the proper implementation of the Special Waste Program.*
- *In conjunction with the Group President, establish supplemental policies and procedures, as needed, to ensure appropriate management of special waste within the Group.*
- *Grant emergency relief from the Special Waste Program in accordance with section 6.3.*

5.5 Group Vice President - Sales and Marketing

Responsibilities

- Manage the sales and marketing activities of the Group's Special Waste Program.
- Communicate customer needs and suggested method(s) to address those needs (i.e., identify opportunities for implementing generic decisions and, if applicable, for obtaining generic approvals from State/local regulatory agencies) to the Group EH&S VP.

5.6 Group Environmental Counsel (GEC)

Responsibilities

- Review and respond to requests to destroy Special Waste Program records.
- Review and grant written decisions on using alternative service agreements for a division or the Group.
- Assist with regulatory interpretations.

5.7 Sales Personnel

Responsibilities

- Properly identify and describe customer's special waste(s).
- Ensure that the Generator's Waste Profile Sheet is complete and accurately describes the customer's waste stream.
- Ensure that a Service Agreement or contract has been completed in accordance with Directive CD-102.
- Assure that every Special Waste customer has a complete and accurate file.
- Assure that customer's waste streams are renewed in a timely manner.

6.0 VARIANCES

6.1 Variance Requests

Unless specifically explained elsewhere in this document, all variance requests shall be made in accordance with the VARIANCE Directive (ED-113).

6.2 Group Variance Approvals

Unless otherwise noted in this document, Group EH&S VPs may approve variances from the Special Waste Program requirements that provide appropriate environmental, health, and safety risk management for the Company or its employees.

Group EH&S VPs may not grant variances that contradict Company Directives or supersede the responsibilities or authorities granted to others in this Directive. For example, Group EH&S VPs may not grant variances from the following:

- The records retention requirements in section 8.0.
- The authority of WMI Counsel to approve alternative service agreements for special waste service.

Variance decisions shall be returned to the person initiating the request, to the appropriate Special Waste Approvals Person, and the Division President.

6.3 Emergency Relief

6.3.a Circumstances Warranting Emergency Relief

Group EH&S VPs or Group Presidents may grant emergency relief from the Special Waste Program when:

- There is a significant environmental risk which requires expeditious management of special wastes, and
- There is a lack of time or practical incapability which precludes meeting the requirements or requesting a variance through normal channels.

Emergency relief is granted under rare circumstances involving one-time or short-time transportation or management of special wastes For example, if emergency relief is granted, a leachate spill may be quickly cleaned up without going through the normal process of the special waste decision process.

6.3.b Emergency Relief Process

In the situations described above, Special Waste Approvals Personnel or Division Presidents may apply to the Group President or Group EH&S VPs for emergency relief. Requests and approvals may be verbal, but written documentation of the request must be completed by the Special Waste Approval Person or Division President within two business days and sent to the Group President or Group EH&S VP. A written decision shall be sent to the Special Waste Approval Person and Division President promptly. In addition, a copy of the request and approval shall be provided to and maintained by the Group EH&S VP.

7.0 TRAINING

Individuals assigned responsibility (see section 5.0) for managing the Special Waste Program must ensure that all employees understand their special waste responsibilities and are capable of conducting them safely and in accordance with applicable requirements. In addition, all employees responsible for waste acceptance or inspection must be trained, at a minimum, to recognize and properly respond to unacceptable wastes.

Any employee requiring training must receive that training within six months of employment or new job responsibilities. Refresher training must be conducted at least every two years or within six months of a revision to this program or any waste identification regulation.

Group EH&S VPs shall provide training materials and train-the-trainer courses. The Division President is responsible for assuring that training is provided to his/her employees. The training shall address, at a minimum, the portions of the following requirements that affect the employee's ability to make proper decisions:

- Identification and management of PCB waste (40 CFR Part 761) and hazardous waste, including listed and characteristic hazardous waste (40 CFR Part 261).
- Standards applicable to generators and transporters of hazardous waste and TSDF operations (40 CFR Part 262, 264, 265, 266).
- Land Disposal Restrictions (40 CFR Part 268).
- State and local requirements that impact management of special waste and hazardous waste.
- Applicability of UHCs, Benzene NESHAP, OSHA Standards, and any other regulations that may affect the management of the waste.
- Subtitle D Operating Criteria (40 CFR Part 258, Subpart C).
- Requirements and safety precautions for hauling and disposing friable asbestos (40 CFR Part 61).
- Management of radioactive waste.
- Special Waste Program.
- Division-specific requirements (e.g., Waste Analysis Plan, procedures for identifying and managing unacceptable waste, emergency response procedures, additional paperwork requirements).

Prior to signing a GWPS, employees must demonstrate competency in the ability to approve waste streams for management. Group EH&S VPs shall determine the proper method and frequency of ensuring competency, but at a minimum, the selected method shall require the employees to complete an example GWPS for which the employee will receive authority. Effective November 1, 1996, only Special Waste Approvals Personnel that have completed the above training and have demonstrated competency as described above may sign a GWPS.

8.0 DOCUMENTATION

Copies of approved Generator's Waste Profile Sheets, must be available at all divisions involved in the management of the waste stream. Supporting information (e.g., analytical data), and all other information pertaining to special wastes must be accessible (e.g., via facsimile) to all affected divisions.

One of the affected divisions must have a file with complete Generator's Waste Profile information. Records shall be retained indefinitely at the division and may not be destroyed without the prior, written approval of the Group Counsel.

All training must be documented and filed at the division (or Customer Service Center).

A copy of any variance or emergency relief from the Special Waste Program granted in accordance with section 6.0 must be documented at the division (or Customer Service Center).

All delegations of authority granted in accordance with section 5.0 must be documented at the division (or Customer Service Center).

All divisions shall implement a procedure for document control and retention which dictates how forms and records will be handled and filed and how the division or Customer Service Center will ensure necessary approvals will be obtained before the renewal of a customers waste stream.

9.0 REFERENCES

1. 29 CFR Part 1910.1001 — OSHA Asbestos Requirements
2. 29 CFR Part 1910.1200 — Hazard Communication
3. 40 CFR Part 61, Subpart M — National Emission Standard for Asbestos
4. 40 CFR Part 82 — Protection of Stratospheric Ozone
5. 40 CFR Part 258 — Criteria for Municipal Solid Waste Landfills
6. 40 CFR Part 261 — Identification and Listing of Hazardous Waste
7. 40 CFR Part 262.11 — Hazardous Waste Determination
8. 40 CFR Part 264 — Permitted Facility Standards
9. 40 CFR Part 265 — Interim Status Facility Standards
10. 40 CFR Part 266 — Recycled/Reuse Standards
11. 40 CFR Part 268 — Land Disposal Restrictions
12. 40 CFR Part 279 — Used Oil Regulations
13. 40 CFR Part 302 — Designation, Reportable Quantities, and Notification
14. 40 CFR Part 761 — PCBs, Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions
15. 40 CFR Part 763 — Asbestos
16. 49 CFR Parts 172 and 173 — Department of Transportation Regulations
17. Interstate Battery Agreement
18. LEACHATE MANAGEMENT Directive
19. Managing Infectious and Chemotherapeutic Wastes-WMI Medical Services Recommended Guidelines
20. Medical Waste Safety Manual
21. NON-WMI Directive
22. Safety Kleen Agreement
23. SPECIAL WASTE Directive
24. SW-846 USEPA "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods"
25. VARIANCE Directive
26. August 3, 1989, memorandum from Peter Kelly and Mike Andrews, SUBJECT: Land Ban Requirements, Leachate, and Contaminated Media
27. October 20, 1989, memorandum from Don Wallgren, SUBJECT: Lead-Acid Battery Management
28. December 28, 1990, memorandum from Kurt Thaus, SUBJECT: November 20, 1990, Federal Register

10.0 APPENDICES

10.1 GLOSSARY

10.2 GENERATOR'S WASTE PROFILE SHEETS

10.3 WASTE-SPECIFIC GUIDANCE

APPENDIX 10.1

GLOSSARY

CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act of 1980.

Class I or Class II Controlled Substance - In accordance with 40 CFR Part 82, Class I or Class II controlled substances are ozone-depleting substances listed in 40 CFR Part 82 Appendix A & B.

Director of an Approved State - In accordance with 40 CFR 258.2, "the chief administrative officer of a State agency responsible for implementing the State municipal solid waste permit program or other system of prior approval that is deemed to be adequate by EPA under regulations published pursuant to sections 2002 and 4005 of RCRA."

Division President (DP) - The WMI employee who is assigned profit & loss and environmental responsibility for a WMI operating location by the Group President.

Empty Container - (Reference 40 CFR 261.7(b)(1) - (3))A container that meets the following description:

All wastes have been removed that can be removed using the practices commonly employed to remove materials from the type of container (e g , pouring, pumping, or aspirating), and

An end has been removed (for containers larger than 25 gallons), and

No more than 1 inch of residue remains on the bottom of the container or inner liner, or

No more than 3 percent by weight of the total capacity of the container remains in the container or inner liner (for 110-gallon containers or smaller), or

No more than 0.3 percent by weight of the total capacity of the container remains in the container or inner liner (for containers larger than 110 gallons)

Containers that once held acutely hazardous wastes (as defined by U S., Canadian, or Mexican Federal or State/Provincial regulations) must be triple rinsed with an appropriate solvent or cleaned by an equivalent method to be considered empty. Alternatively, the container's liner may be removed and managed as a hazardous waste by Technology Services, while the outer shell is managed as a special waste. Containers that once held pesticides regulated under the Federal Insecticide, Fungicide and Rodenticide Act must be emptied according to label instructions. Cylinders of compressed gas are empty when the pressure in the container is substantially equivalent to atmospheric pressure.

Friable Asbestos - In accordance with 40 CFR 61.141, "friable asbestos material means any material containing more than 1 percent asbestos as determined using the method specified in appendix A, subpart F, 40 CFR 763 section 1, Polarized Light Microscopy, that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure. If the asbestos content is less than 10 percent as determined by a method other than point counting by polarized light microscopy (PLM), verify asbestos content by point counting using PLM "

Generator's Waste Profile Sheet - WMI Form WMI-SW or WMI-HW, both dated August 1996, or equivalent approved by the Group Counsel and Group EH&S VP.

Group Environmental, Health, and Safety Vice President (EH&S VP) - The person serving as principal Environmental, Health, and Safety Program Leader in a WMI Group.

Hazardous Waste - A special waste determined to be a "hazardous waste" by U.S., Mexican, or Canadian Federal, State (including the State of waste origin or the State in which the proposed management facility is located), or Provincial rules. This definition also includes any special waste whose management requires approval or a license from an agency of the U.S., Mexican, or Canadian Federal government (e.g., PCB waste, radioactive waste).

Hazardous Waste Facility - A facility which has received all required U.S , Mexican, or Canadian Federal, or State/Provincial approvals, licenses, or permits necessary to receive and manage hazardous waste.

Industrial Waste - Any process waste resulting from the manufacturing of a product or performance of a service.

Liquid Waste - Any waste that is determined to contain "free liquids" as determined by Method 9095 (Paint Filter Liquids Test), described in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" USEPA Publication SW-846. According to 40 CFR 258.28, this definition does not include waste in containers similar in size to that normally found in household waste, or waste in containers designed to hold liquids for use other than storage.

Management - Transportation, transfer, storage, treatment, reclamation, incineration or disposal of waste

Non-WMI Facility - Any ultimate management facility, excluding laboratories, that is not owned or operated by WMI and is used in the management of waste (e.g., transfer stations, recycling centers, incinerators, and landfills).

Non-WMI Laboratory - Any laboratory that is not owned or operated by WMI.

RACM - Regulated Asbestos Containing Material (Reference 40 CFR 61.141) "means (a) friable asbestos material, (b) Category I nonfriable ACM that has become friable, (c) Category I nonfriable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading, or (d) Category II nonfriable ACM that has a high probability of becoming or has become crumbled pulverized, or reduced to powder by the forces expected to act on the material in course of demolition or renovation operations regulated by this subpart.

Site-Generated Special Waste - Refer to "WMI-Generated Special Waste."

Special Handling - Any waste that causes WMI to alter standard collection, transportation, processing, or landfilling practices for safety, health, regulatory or environmental reasons (e.g., immediate burial, worker protection, solidification, bioremediation, analysis, engineering controls, or any other special preparation to receive the waste).

Special Waste - Any waste from a non-residential source (i.e., commercial or industrial) that could be a hazardous waste, regulated polychlorinated biphenyls (PCBs), regulated radioactive waste, or that invokes special handling are special wastes. All industrial wastes are special wastes. Commercial wastes that invoke special handling are special wastes (refer to definition of special handling).

Service Agreement - Refer to Directive CD-102 for description/definition

Special Waste Approvals Person - A WMI employee, designated in writing by the Group EH&S VP as having authority to approve special waste decisions for a WMI operating location(s) or for a facility that is used or proposed to be used for the management of a special waste. The Special Waste Approvals Person and Division President shall not be the same individual.

SW-846 Methods - The latest edition of "Test Methods for Evaluating Solid Waste, Physical/Chemical

Methods" USEPA Publication SW-846.

Toxic Substances Control Act - TSCA

TSCA - Refer to Toxic Substances Control Act above.

UHCs - Underlying Hazardous constituents. Refer to 40 CFR 268.2(I).

Ultimate Management Facility - A facility at which a waste is either disposed or managed such that additional management of the original waste is not required.

UTS - Universal Treatment Standards

WAP - Waste Analysis Plan

WMI - Waste Management, Inc., or any division or subsidiary thereof.

WMI-Generated Special Waste - Special wastes produced by or resulting from activities and operations at a WMI facility. Examples of common WMI-generated special wastes are:

- Leachate
- Gas condensate
- Used oils and other petroleum products
- Waste paint
- Spent solvents
- Residuals from wastewater treatment, tank cleaning, boiler cleanout
- Spill cleanup wastes (e.g., contaminated soil, absorbent materials)
- Batteries (i.e., lead-acid, industrial dry cell)
- Waste antifreeze
- Pesticides, fertilizers and their containers
- Transformers removed from service
- Contaminated runoff
- Vehicle/equipment washwater and residue
- Underground storage tanks removed from service
- Used oil filters
- Any other wastes designated by a Special Waste Approvals Person, Division President, or Group Environmental, Health & Safety Vice President

The following wastes are excluded from this definition:

- Used equipment parts exchanged one-for-one with an equipment parts/auto supply distributor.
- Employee uniforms or shop rags, unless they have been soiled with hazardous waste.

APPENDIX 10.2

GENERATOR'S WASTE PROFILE SHEETS

GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

Service Agreement on File? ☐YES ☐NO Profile Number: WMI _____

☐Hazardous ☐Non-Hazardous ☐TSCA Renewal Date: / /

A. Waste Generator Information

1. Generator Name: _____
2. SIC Code: _____
3. Facility Street Address: _____
4. Phone: ( ) _____
5. Facility City: _____
6. State/Province: _____
7. Zip/Postal Code: _____
8. Generator USEPA/Federal ID #: _____
9. County: _____
10. State/Province ID #: _____
11. Customer Name: _____
12. Customer Phone: ( ) _____
13. Customer Contact: _____
14. Customer Fax: _____
15. Billing Address ☐Same as above

B. Waste Stream Information

1. **Description**

a. Name of Waste: _____

b. Process Generating Waste: _____

c. Color	d. Strong odor (describe):	e Physical state @ 70°F	f Layers	g Free liquid range
		☐Solid ☐Liquid	☐Single Layer	_____ to _____ %
		☐Gas ☐Sludge	☐Multi-layer	
		☐Other _____		h. pH: Range
				_____ to _____ %

i. Liquid Flash Point: ☐<73°F ☐73-99°F ☐100-139°F ☐140-199°F ☐≥ 200°F ☐Not applicable

j. Chemical Composition (List all constituents [including halogenated organics, debris, and UHC's] present in any concentration and submit representative analysis)

Constituents	Concentration Range	Constituents	Concentration Range

TOTAL COMPOSITION MUST EQUAL OR EXCEED 100%

k. ☐Oxidizer ☐Pyrophoric ☐Explosive ☐Radioactive
☐Carcinogen ☐Infectious ☐Shock Sensitive ☐Water Reactive

l. Does the waste represented by this profile contain any of the carcinogens which require OSHA notification? (list in Section B.1.j)... ☐YES ☐NO

m. Does the waste represented by this profile contain dioxins? (list in Section B.1.j)... ☐YES ☐NO

n. Does the waste represented by this profile contain asbestos?... ☐YES ☐NO
If yes... ☐friable ☐non-friable

o. Does the waste represented by this profile contain benzene?... ☐YES ☐NO
If yes, concentration _____ ppm
Is the waste subject to the benzene waste operations NESHAP? ... ☐YES ☐NO

p. Is the waste subject to RCRA Subpart CC controls?... ☐YES ☐NO
If yes, volatile organic concentration _____ ppmw

q. Does the waste contain any Class I or Class II ozone-depleting substances?.. ☐YES ☐NO

r. Does the waste contain debris? (list in Section B.1.j). ☐YES ☐NO

2. **Quantity of Waste**

Estimated Annual Volume _____ ☐Tons ☐Yards ☐Drums ☐Other (specify) _____

3. **Shipping Information**

a. Packaging:
☐Bulk Solid; Type/Size: _____ ☐Bulk Liquid, Type/Size: _____
☐Drum; Type; Size: _____ ☐Other: _____

b. Shipping Frequency: Units _____ Per: ☐Month ☐Quarter ☐Year ☐One time ☐Other _____

c. Is this a U.S. Department of Transportation (USDOT) Hazardous Material? (If no, skip d, e, and f). ... ☐YES ☐NO

GENERATOR'S WASTE PROFILE SHEET

Profile Number: WMI _____

PLEASE PRINT IN INK OR TYPE

d. Reportable Quantity (lbs.; kgs.): _____ e. Hazard Class/ID #: _____
f. USDOT Shipping Name: _____
g. Personal Protective Equipment Requirements: _____
h. *Transporter/Transfer Station:* _____

C. Generator's Certification (Please check appropriate responses, sign, and date below.)

1 Is this a USEPA hazardous waste (40 CFR Part 261)? If the answer is no, skip to 2 . . . ☐YES ☐NO
a *If yes, identify ALL USEPA listed and characteristic waste code numbers (D, F, K, P, U)* _____
b. If a characteristic hazardous waste, do underlying hazardous constituents (UHCs) apply? (if yes, list in Section B 1 j) . . . ☐YES ☐NO
c. Does this waste contain debris? (if yes, list size and type in Chemical Composition - B.1) . . . ☐YES ☐NO

2. Is this a state hazardous waste? . . . ☐YES ☐NO
Identify **ALL** state hazardous waste codes _____

3 Is the waste from a CERCLA (40 CFR 300, Appendix B) or state mandated clean-up? . . . ☐YES ☐NO
If yes, attach Record of Decision (ROD), 104/106 or 122 order or court order that governs site clean-up activity. For state mandated clean-up, provide relevant documentation

4 Does the waste represented by this waste profile sheet contain radioactive material, or is disposal regulated by the Nuclear Regulatory Commission? . . . ☐YES ☐NO

5 Does the waste represented by this waste profile sheet contain concentrations of Polychlorinated Biphenyls (PCBs) regulated by 40 CFR 761? (if yes, list in Chemical Composition - B 1 j) . . . ☐YES ☐NO
a. If yes, were the PCBs imported into the U S ? . . . ☐YES ☐NO

6 Do the waste profile sheet and all attachments contain true and accurate descriptions of the waste material, and has all relevant information within the possession of the Generator regarding known or suspected hazards pertaining to the waste been disclosed to the Contractor? . . . ☐YES ☐NO

7 Will all changes which occur in the character of the waste be identified by the Generator and disclosed to the Contractor prior to providing the waste to the Contractor? . . . ☐YES ☐NO

☐Check here if a Certificate of Destruction or Disposal is required

Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method I authorize WMI to obtain a sample from any waste shipment for purposes of recertification If this certification is made by a broker, the undersigned signs as authorized agent of the generator and has confirmed the information contained in this Profile Sheet from information provided by the generator and additional information as it has determined to be reasonably necessary If approved for management, Contractor has all the necessary permits and licenses for the waste that has been characterized and identified by this approved profile

Certification Signature: _____ Title: _____
Name (Type or Print): _____ Company Name: _____ Date: _____
☐Check if additional information is attached. Indicate the number of attached pages _____

D. WMI Management's Decision — FOR WMI USE ONLY

1. Management Method ☐Landfill ☐Non-hazardous Solidification ☐Bioremediation ☐Incineration
☐Hazardous Stabilization ☐Other (Specify) _____
2. Proposed Ultimate Management Facility: _____
3. Precautions, Special Handling Procedures, or Limitation on Approval: _____

4. Waste Form _____ 5. Source _____ 6 System Type _____
Special Waste Decision . . . ☐Approved ☐Disapproved
Salesperson's Signature: _____ Date: _____
Division Approval Signature (Optional): _____ Date: _____
Special Waste Approvals Person Signature: _____ Date: _____

GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

Instructions

Information on this form is used to determine if the waste may be transported, treated, stored or disposed in a legal, safe, and environmentally sound manner. This information will be maintained in strict confidence. Answers must be provided for sections A, B, and C and must be printed in ink or typed. A response of "NONE" or NA" (not applicable) can be made if appropriate. If additional space is needed, indicate on the form that additional information is attached, and attach the information to Generator's Waste Profile Sheet. If you have questions concerning this form, please contact the Contractor's sales representative.

A. Waste Generator Information

1. **Generator Name** - *Enter the name of the facility where the waste is generated.*
2. **SIC Code** - Enter the four digit Standard Industrial Classification Code for the facility where the waste is generated.
3. **Facility Street Address** - Enter the street address (not P.O. Box) of the facility where the waste is generated.
4. **Phone** - Enter Generator's area code and phone number.
5. **Facility City** - Enter the city where the waste is generated.
6. **State/Province** - Enter the state or province where the waste is generated.
7. **Zip/Postal Code** - Enter the generating facility's zip or postal code.
8. **Generator USEPA/Federal ID #** - Enter the identification number issued by the USEPA, Canadian, or Mexican Federal Agency to the facility generating the waste (if applicable)
9. **County** - *Enter the county where the waste is generated*
10. **State/Province ID #** - Enter the identification number issued by the state or province to the facility generating the waste (if applicable).
11. **Customer Name** - Entity that the Contractor is directly working with regarding the represented waste stream. If the same as the Generator, mark "Same as Above".
12. **Customer Phone** - Enter technical contact's area code and telephone number.
13. **Customer Contact** - Enter the name of the person who can answer technical questions about the waste.
14 **Customer Fax** - Area code and facsimile number for the customer.
15 **Billing Address** - Address where bill for services should be sent.

B. Waste Stream Information

1.a. **Name of Waste** - Enter a name generally descriptive of this waste (e.g., paint sludge, fluorescent bulbs).

1.b. **Process Generating Waste** - Describe the process generating the waste in detail. List the specific process/operation or source that generates the waste (e.g., incineration of municipal refuse, asbestos removal, wastewater treatment, building maintenance).

At a minimum, the Generator should answer the following questions in determining the process generating the waste.

- What chemicals are stored and/or used at the facility?
- Is the waste generated from the production/manufacturing of any of the following industries wood preservation, inorganic pigments, organic pigments, pesticides, explosives, petroleum refining, iron and steel, copper, lead or zinc production?
- Is the waste a result from degreasing, solvent parts cleaning, recovery/reclaiming of solvents (bottoms), wastewater treatment (sludges), or electroplating?

1.c. **Color** - Describe the color of the waste (e.g., blue, transparent, varies).

1.d. **Strong odor** - DO NOT SMELL THE WASTE! If the waste has a known odor, then describe (e.g., acrid, pungent, solvent, sweet).

1.e. **Physical state @ 70°F** - If the four boxes provided do not apply, a descriptive phrase may be entered after "Other" (e.g., multi-phase).

1.f. **Layers** - Single Layer means the waste is homogenous Multi-layer means the waste is comprised of two or more layers (e.g., oil/water/sludge).

1.g. **Free liquid range** - Range (in percent by volume) of free liquids in the waste.

1.h. **pH Range** - Indicate the pH range.

1.i. **Liquid Flash Point** - Indicate the flash point obtained using the appropriate test method.

1.j. **Chemical Composition** - List all organic and/or inorganic components of the waste using chemical names. If trade names are used, attach Material Safety Data Sheets or other documents that adequately describe the composition of the waste. For each component, estimate the range (in percent) in which the component is present.

1.k Check all that apply.

1 l. Identify any element, chemical compound, or mixture in concentration of 0.1 percent or greater that is considered a carcinogen or potential carcinogen pursuant to OSHA.

1.m. Indicate if the waste contains any dioxins (list in Section B.1.j)

1 n. Indicate if the waste contains asbestos. Indicate if the asbestos is friable.

1 o. Indicate if the waste contains benzene, the level in ppm, and whether it is subject to the benzene NESHAP.

1.p. Indicate if the waste is subject to RCRA Subpart CC control In addition, indicate the volatile organic concentration, if known, in parts per million weight.

1 q. Indicate if the waste contains any Class I or Class II ozone-depleting controlled substances.

1.r. Indicate if the waste contains debris (list size and type in B.1.j).

GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

2. **Quantity of Waste** - Approximate volume in tons, yards, or other (e.g., drums, gallons) that will be received by the ultimate management facility. This volume amount is not intended for use in complying with state and/or permit restrictions.
3.a. **Packaging** - Choose the appropriate option or "other" along with a description.
3.b. **Shipping Frequency** - Choose the appropriate option or "other" along with a description.
3.c. **Is this a U.S. Department of Transportation (USDOT) hazardous material?** - Choose the appropriate response: yes or no.
3.d. **Reportable Quantity (lbs.; kgs.)** - If the answer to 3.c. is yes, enter the Reportable Quantity (RQ) established by 40 CFR 302.4 or equivalent Canadian or Mexican regulation for this waste. Indicate the appropriate units for the RQ.
3.e. **Hazard Class/ID #** - If the answer to 3.c. is yes, indicate the proper USDOT hazard class and identification number.
3.f. **USDOT Shipping Name** - IF the answer to 3.c. is yes, enter the proper USDOT shipping name for the waste.
3.g. **Personal Protective Equipment Requirements** - All personal protective equipment necessary to safely manage the waste stream.
3.h. **Transporter/Transfer Station** - Transporter and/or transfer station name.

C. Generator's Certification (Please check appropriate responses, sign, and date below.)

Indicate the appropriate response to questions/statements 1, 2, 3, 4, 5, 6, and 7. By signing this Generator's Waste Profile Sheet, the Generator certifies the responses are true and accurate with respect to the waste stream(s) listed.

Certification Signature - Signature of an authorized employee of the Generator or representative of the generator if authorized in writing by the generator.
Title - Enter Employee's title
Name - Type or Print Employee's name.
Company Name - Company employing the person certifying the Generator's Waste Profile Sheet.
Date - Enter the date this Generator's Waste Profile Sheet is signed.

D. WMI Management's Decision — FOR WMI USE ONLY

To be completed by WMI.

GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

Service Agreement on File? ☐YES ☐NO

Profile Number: WMI _____

Renewal Date: / /

A. Waste Generator Information

1. Generator Name: _____
2. SIC Code: _____
3. Facility Street Address: _____
4. Phone: ( ) _____
5. Facility City: _____
6. State/Province: _____
7. Zip/Postal Code: _____
8. Generator USEPA/Federal ID #: _____
9. County: _____
10. State/Province ID #: _____
11. Customer Name: _____
12. Customer Phone: ( ) _____
13. Customer Contact: _____
14. Customer Fax: _____

B. Waste Stream Information

1. Name of Waste: _____
2. State Waste Code: _____
3. Process Generating Waste: _____
4. Estimated Annual Volume _____ ☐Tons ☐Yards ☐Other (specify) _____
5. Personal Protective Equipment Requirements: _____
6. Transporter/Transfer Station: _____
7. Is this a U S Department of Transportation (USDOT) Hazardous Material? (If no, skip 8, 9, & 10). ☐YES ☐NO
8. Reportable Quantity (lbs.; kgs.): _____
9. Hazard Class/ID #: _____
10. USDOT Shipping Name: _____

☐Check if additional information is attached. Indicate the number of attached pages:

C. Generator's Certification (Please check appropriate responses, sign, and date below.)

1 Is the waste represented by this waste profile sheet a "Hazardous Waste," as defined by USEPA, Canadian, Mexican and/or state/province regulation, in the location where generated or ultimately managed? ☐YES ☐NO

2 Does the waste represented by this waste profile sheet contain regulated radioactive material or regulated concentrations of Polychlorinated Biphenyls (PCBs)? ☐YES ☐NO

3. Does this waste profile sheet and all attachments contain true and accurate descriptions of the waste material? ☐YES ☐NO

4 Has all relevant information within the possession of the Generator regarding known or suspected hazards pertaining to the waste been disclosed to the Contractor? ☐YES ☐NO

5 Is the analytical data attached hereto derived from testing a representative sample in accordance with 40 CFR 261.20 (c) or equivalent rules?. ☐NA ☐YES ☐NO

6 Will all changes that occur in the character of the waste be identified by the Generator and disclosed to the Contractor prior to providing the waste to the Contractor? ☐YES ☐NO

Certification Signature: _____ Title: _____

Name (Type or Print): _____ Company Name: _____ Date: _____

D. WMI Management's Decision — FOR WMI USE ONLY

1 Management Method: ☐Landfill ☐Solidify ☐Bioremediation ☐Other (Specify) _____

2. Proposed Ultimate Management Facility: _____ 3. Hours of acceptance: _____ ☐NA

4. Supplemental Information: _____

5. Precautions, Special Handling Procedures, or Limitations on Approval: _____

Special Waste Decision ☐Approved ☐Disapproved

Salesperson's Signature: _____ Date: _____

Division Approval Signature (Optional): _____ Date _____

Special Waste Approvals Person Signature: _____ Date: _____

GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

Instructions

Information on this form is used to determine if the waste may be transported, treated, stored or disposed in a legal, safe, and environmentally sound manner. This information will be maintained in strict confidence. Answers must be provided for section A, B, and C and must be printed in ink or typed. A response of "None" or "NA" (not applicable) can be made if appropriate. If additional space is needed, indicate on the form that additional information is attached, and attach the information to the Generator's Waste Profile Sheet. If you have questions concerning this form, please contact the Contractor's sales representative.

A. Waste Generator Information

1. **Generator Name** - Enter the name of the facility where the waste is generated.
2. **SIC Code** - Enter the four digit Standard Industrial Classification Code for the facility where the waste is generated.
3. **Facility Street Address** - Enter the street address (not P.O. Box) of the facility where the waste is generated.
4. **Phone** - Enter Generator's area code and phone number.
5. **Facility City** - Enter the city where the waste is generated.
6. **State/Province** - Enter the state or province where the waste is generated.
7. **Zip/Postal Code** - Enter the generating facility's zip or postal code.
8. **Generator USEPA/Federal ID #** - Enter the identification number issued by the USEPA, Canadian, or Mexican Federal Agency to the facility generating the waste (if applicable).
9. **County** - Enter the county where the waste is generated
10. **State/Province ID #** - Enter the identification number issued by the state or province to the facility generating the waste (if applicable).
11. **Customer Name** - Entity that the Contractor is directly working with regarding the represented waste stream. If the same as the Generator, mark "Same as Above".
12. **Customer Phone** - Enter technical contact's area code and telephone number.
13. **Customer Contact** - Enter the name of the person who can answer technical questions about the waste
14. **Customer Fax** - Area code and facsimile number for the customer.

B. Waste Stream Information

1. **Name of Waste** - Enter a name generally descriptive of this waste (e.g , paint sludge, fluorescent bulbs).
2. **State Waste Code** - If applicable, the code assigned to the specific waste stream by the state regulatory agency.
3. **Process Generating Waste** - Describe the process generating the waste in detail. List the specific process/operation or source that generates the waste (e g , incineration of municipal refuse, asbestos removal, wastewater treatment, building maintenance).
   At a minimum, the Generator should answer the following questions in determining the process generating the waste.
   - What chemicals are stored and/or used at the facility?
   - Is the waste generated from the production/manufactu...g of any of the following industries: wood preservation; inorganic pigments; organic pigments; pesticides; explosives; petroleum refining, iron and steel, copper, lead or zinc production?
   - Is the waste a result from degreasing, solvent parts cleaning, recovery/reclaiming of solvents (bottoms), wastewater treatment (sludges), or electroplating?
4. **Estimated Annual Volume** - Approximate volume in tons, yards, or other (e.g., drums, gallons) that will be received by the ultimate management facility. This volume amount is not intended for use in complying with state and/or permit restrictions.
5. **Personal Protective Equipment Requirements** - All personal protective equipment that is necessary to safely manage the waste stream.
6. **Transporter/Transfer Station** - Transporter and/or transfer station name.
7. **Is this a U.S. Department of Transportation (USDOT) hazardous material?**-Choose the appropriate response: yes or no.
8. **Reportable Quantity (lbs.; kgs.)** - If the answer to 7 is yes, enter the Reportable Quantity (RQ) established by 40 CFR 302.4 or equivalent Canadian or Mexican regulation for this waste. Indicate the appropriate units for the RQ.
9. **Hazard Class/ID #** - If the answer to 7 is yes, indicate the proper USDOT hazard class and identification number.
10. **USDOT Shipping Name** - If the answer to 7 is yes, enter the proper USDOT shipping name for the waste.

C. Generator's Certification

Indicate the appropriate response to questions/statements 1, 2, 3, 4, 5, and 6. By signing this Generator's Waste Profile Sheet, the Generator certifies the responses are true and accurate with respect to the waste stream(s) listed.

Certification Signature - Signature of an authorized employee of the Generator or representative of the generator if authorized in writing by the generator.
Title - Enter Employee's title.
Name - Print or Type Employee's name.
Company Name - Company employing the person certifying the Generator's Waste Profile Sheet.
Date - Enter the date this Generator's Waste Profile Sheet is signed.

D. WMI Management's Decision - FOR WMI USE ONLY

To be completed by WMI

APPENDIX 10.3

WASTE-SPECIFIC GUIDANCE

Appendix 10.3
Waste-Specific Guidance

This table is intended to provide technical assistance for WMI employees and is not intended to represent all waste streams that might need analytical information or that may be affected by hazardous waste requirements WMI employees should supplement this information to account for state, provincial, Mexican, or local requirements and the unique wastes under consideration.

Legend:
Waste Stream, Generator, Management Method

These three columns provide the starting point for accessing information for the rest of the table. Match the waste stream in question with the applicable generator and management method scenarios and continue reading across the row to identify Suggested Minimum Testing and Hazardous Waste Requirements Please note that management methods are only indicated for instances when they impact how the waste is regulated

Suggested Minimum Testing

This column is provided as guidance to assist WMI employees in determining what analytical information may be helpful in approving Special Waste Management Decisions. The suggested testing could be used as a starting point but should not be considered an exhaustive reference of necessary analytical information for all wastes under consideration. This column assumes that the waste is known not to be ignitable, reactive, corrosive, as defined in 40 CFR 261. When unsure if this assumption is correct, Attachment 2 below includes test methods to assist in making this determination. The following attachments provide additional testing information.

Attachment 1 - TCLP constituents
Attachment 2 - Information to assist in determining waste properties and whether a full TCLP will be needed (e.g., If a concern regarding metals exists, a total metals analysis can be performed using the test methods shown in Attachment 2. If the total metals analysis demonstrates that no regulatory concentrations have been exceeded, a TCLP might not be needed.)
Attachment 3 - F039 constituents and test methods

Precautions, Special Handling Procedures, or Limitations

Information provided to assist in the management of the waste stream

If Hazardous
Quantity — The "Quantity" column indicates if the generating facility is required to include the amount of a given waste stream towards the total quantity of hazardous waste that the facility generates in a month. Federal Regulatory citations are given to explain the rationale for the "No" entries According to 40 CFR 261 5, a facility that generates less than 100 kg (220 lbs.) of hazardous waste in a month (i.e., "conditionally exempt small quantity generator") is not subject to the Federal Regulations that apply to hazardous waste generators unless the facility accumulates more than 1000 kg of hazardous waste on site at any time (40 CFR 261.5(g)(2)).

Land Ban Requirements — The federal regulations don't require that specific forms be used but do require that minimum information be included on the forms that are used.
1 = One-time notification to file (Does not require a specific form; 40 CFR 268 7(a)(6)).
2 = Land Disposal Restriction Notification (40 CFR 268.7(a)(3)).
3 = Land Disposal Restriction Notification or Certification (40 CFR 268.7(a)(1) or (2)).
4 = Comply with 40 CFR 268.7(a)(4)

Waste Stream	Generator	Management Method	Suggested Minimum Testing	Precautions, Special Handling Procedures or Limitations	IF HAZARDOUS	
					Quantity	Land Ban Requirements
Absorbent Material (contaminated with gasoline)	WMI	Dispose	• Full TCLP excluding pesticide and herbicides (may be limited to TCLP for lead and benzene if known that virgin was absorbed) • Paint filter test		Yes	3 - if benzene > 0.5 ppm TCA or if lead >5 ppm TCLP
Absorbent Material (contaminated with petroleum products other than gasoline)	WMI	Dispose	• Paint filter test • PCBs - if there is oil content (excluding virgin oil)		Yes	3
Absorbent Material (with unknown contaminant)	WMI	Dispose	• Full TCLP • Paint Filter Test • PCBs - if there is oil content (excluding virgin oil)		Yes	3
Antifreeze	WMI	Recycle			Yes	3
Antifreeze	WMI	Other	• Full TCLP excluding pesticides and herbicides		Yes	3
Auto Fluff	Incoming	Dispose	• Use EPA Filed Manual entitled "Sampling Guidance For Scrap Metal Shredders" EPA 747-R-93-009, dated August 1993			
Delisted Hazardous Waste	Incoming	Dispose		WMI divisions may manage wastes that were formerly listed as hazardous waste but that have been formally "delisted" by the regulatory authority These delisted wastes must be managed as special waste, subject to the following conditions. • WMI Landfills must meet the Federal or State Subtitle D design criteria. • A copy of the regulatory authority's action to delist the waste must be included with the special waste paperwork.		
Fluorescent light tubes	Incoming	Disposal	• TCLP metals			3 - if mercury > 0.2 ppm TCLP

Waste Stream	Generator	Management Method	Suggested Minimum Testing	Precautions, Special Handling Procedures or Limitations	IF HAZARDOUS Quantity	IF HAZARDOUS Land Ban Requirements
Fly Ash	WMI	Disposal	• TCLP excluding pesticides and herbicides • Use EPA's publication *"Guidance for the Sampling and Analysis of Municipal Waste Combustion Ash for the Toxicity Characteristic"*, dated June 1995, EPA Publication Number EPA 530-R-95-036 • Paint Filter Test		Yes	3
Fossil Fuel/Wood Ash						
F039 Leachate	WMI	Deepwell	• See Attachment 3		Yes	3
F039 Leachate	WMI	On-site treatment	• See Attachment 3		Yes	4
F039 solids (e.g., filter cake from on-site treatment)	WMI	Landfill or Incineration	• See attachment 3		Yes	3
Gas Condensate	WMI	POTW	• TCLP • Discharge Limits		Yes	1
Gas Condensate	WMI	Other	• TCLP		Yes	3
Leachate	WMI	Deepwell	• TCLP excluding pesticides and herbicides (unless site conditions or history dictates need to test for pesticides and herbicides)		Yes	3
Leachate	WMI	POTW	• TCLP excluding pesticides and herbicides (unless site conditions or history dictates need to test for pesticides and herbicides)		Yes	1
Lead-acid battery	WMI	Regenerated/ Reclaimed	• N/A - assume it would not pass TCLP	**<u>On-site Management</u>** Store spent lead-acid batteries that are being accumulated at WMI divisions as follows: • Notify employees of the corrosive properties of battery acid. • Post a "No smoking" sign in the battery storage area.	No 261 6(a)(3)(ii) 261 6(a)(2)(v) 266 80(a)	1

Waste Stream	Generator	Management Method	Suggested Minimum Testing	Precautions, Special Handling Procedures or Limitations	IF HAZARDOUS: Quantity	IF HAZARDOUS: Land Ban Requirements
				• Provide a fire extinguisher near the storage area. • Do not drain acid from batteries. • Locate storage areas where they are secure and protected from heavy equipment and from the weather • Store batteries neatly on an impervious surface that has proper drainage to prevent the batteries from being stored in contact with accumulated water • Inspect monthly for spills and document all inspection results • Properly contain any leaking batteries. **Precautions, Conditions, Limitations** • Unless the WMI facility is documented as a "conditionally exempt small quantity generator" as defined in 40 CFR 261.5, file a one-time notice to the WMI facility's files in accordance with 40 CFR 268.7(a)(6) prior to shipping batteries offsite • If spent batteries are being returned to a vendor other than Interstate Battery, a scaled down non-WMI review must be conducted or a Recyclable Materials Certification completed on the first entity that is used to manage the batteries. The review must determine that batteries are being recycled and that appropriate storage facilities are available but is not required to determine or evaluate ultimate management facilities. • If monthly inspections of storage areas identify concerns with the storage facility or conditions of the batteries, the inspection frequency shall increase to daily, and the batteries must be removed from the facility at the earliest available opportunity of the transporter.		
Lead-acid battery	WMI	Other	N/A - assume it would not pass TCLP	See Above	Yes	3

Waste Stream	Generator	Management Method	Suggested Minimum Testing	Precautions, Special Handling Procedures or Limitations	IF HAZARDOUS	
					Quantity	Land Ban Requirements
Medical Waste Incinerator Ash						
Municipal Waste Combustion Ash	Incoming	Disposal	• Use EPA's publication *"Guidance for the Sampling and Analysis of Municipal Waste Combustion Ash for the Toxicity Characteristic"*, dated June 1995, EPA Publication Number EPA 530-R-95-036 • Paint Filter Test			
Parts cleaning solvent	WMI	Recycled by Safety-Kleen	Listed hazardous waste		Yes	3 unless 40 CFR 268 7(a)(10) applies
Parts cleaning solvent	WMI	Recycled by Safety-Kleen	Characteristic for flash point		Yes	3 unless 40 CFR 268.7 (a)(10) applies
Petroleum contaminated soil	Incoming	Dispose	Petroleum contaminated soils regulated under 40 CFR 280 (UST Cleanup) should test for the following. • TCLP metals, if the petroleum component is used oil or is unknown, • Lead, if the petroleum component is heavy weight non-used oil or leaded gasoline; or • Testing may not be necessary, if the petroleum component is unleaded gasoline or diesel fuel.			
Petroleum contaminated soil not covered under 40 CFR 280	Incoming					

Waste Stream	Generator	Management Method	Suggested Minimum Testing	Precautions, Special Handling Procedures or Limitations	IF HAZARDOUS	
					Quantity	Land Ban Requirements
Polychlorinated Biphenyls (PCBs) bearing wastes	Incoming	Dispose	• PCBs (SW 846 - method 8080)			
Regulated Asbestos Containing Material (RACM)	Incoming	Disposal		**Packaging** • Regulated Asbestos Containing Material (RACM) must be wetted & sealed in closed impermeable containers. • RACM containers must be labeled with: the OSHA warning label, name of generator and location of waste generation, and proper DOT shipping name, reportable quantity and hazard class • Each shipment of RACM must be accompanied by the information outlined in 40 CFR 61.149(e)(1) **Transportation** • RACM must be transported in appropriate vehicles to ensure that containers remain intact and are not compacted. • RACM transported in open roll-off containers must be covered with a tarp. • RACM that is exposed at the time of pick-up shall not be moved until the generator/customer has sealed/resealed the RACM containers **Disposal** • WMI employees will not accept improperly packaged RACM and will work with the Division President to determine required action if improperly packaged material is discovered at a landfill. • RACM must be placed in an area separate from the active face and should not be compacted		

Waste Stream	Generator	Management Method	Suggested Minimum Testing	Precautions, Special Handling Procedures or Limitations	IF HAZARDOUS: Quantity	IF HAZARDOUS: Land Ban Requirements
				• RACM must be covered immediately after disposal with soil or refuse. • RACM must be covered at the end of the day (40 CFR 61.154) with six inches of soil or alternate cover approved by the regulatory agency. • Except for asbestos monofills, RACM may not be placed within 10 ft. of the perimeter or side slope of the fill area or within 10 feet of the base of any final cover. • If disposed at a WMI landfill, the disposal location of each RACM load must be recorded using a 3-D grid system (40 CFR 61.154) **General Safety** • WMI personnel involved in the loading/unloading or disposal of regulated asbestos containing material (RACM) must wear a properly fitted, approved respirator during these activities (29 CFR 1910.120).		
Sludges	Incoming	Dispose	• TCLP • Paint filter test			
Treated Characteristic Hazardous Waste	Incoming/ WMI	Dispose		WMI divisions may manage treated characteristic waste (TCW) streams as special wastes, provided that the following conditions are met prior to managing the waste. • WMI Landfills must meet the design criteria of the Federal or State Subtitle D design criteria		

Waste Stream	Generator	Management Method	Suggested Minimum Testing	Precautions, Special Handling Procedures or Limitations	IF HAZARDOUS Quantity	IF HAZARDOUS Land Ban Requirements
				• One certification form per waste stream must be obtained from each generator or treatment facility every day that the generator provides TCW to a WMI division. All WMI divisions that manage the TCW must file and maintain a copy of all certification forms. The certification form must include at a minimum - Name and address of the Subtitle D facility receiving the waste - Description of the waste as initially generated, including applicable EPA Hazardous Waste Number(s) and treatability groups, and underlying hazardous constituents. - Treatment standards applicable to the waste at the initial point of generation - A certification statement that includes language found in 40 CFR 268.7(b)(5)(i) or (b)(5)(v) - The signature of an authorized representative of the generator. • WMI hauling division employees that enter a hazardous waste treatment, storage, or disposal facility to pick up waste/drop-off containers must receive health and safety training applicable to the activities that they conduct at the facility		
Used oil	WMI	Burned for energy	• Analysis required by waste collector • Total halogens (in excess of 1000 ppm is presumed to be hazardous waste - see 40 CFR 266.40(c))		Yes 261 6(a) (2)(iii)	3

ATTACHMENT 1

TCLP CONSTITUENTS - SW 846 - TEST METHOD #1311

WASTE CODE	CONSTITUENT
METALS	
D004	Arsenic
D005	Barium
D006	Cadmium
D007	Chromium
D008	Lead
D009	Mercury
D010	Selenium
D011	Silver
VOLATILE ORGANICS	
D018	Benzene
D019	Carbon Tetrachloride
D021	Chlorobenzene
D022	Chloroform
D028	1,2-Dichloroethane
D029	1,1-Dichloroethylene
D035	Methyl Ethyl Ketone
D039	Tetrachloroethylene
D040	Trichloroethylene
D043	Vinyl Chloride
SEMI-VOLATILES	
D023	o-Cresol
D024	m-Cresol
D025	p-Cresol
D026	Cresol (total)
D027	1,4-Dichlorobenzene
D030	2,4-Dinitrotoluene
D032	Hexachlorobenzene
D033	Hexachlorobutadiene
D034	Hexachloroethane
D036	Nitrobenzene
D037	Pentachlorophenol
D038	Pyridine
D041	2,4,5-Trichlorophenol
D042	2,4,6-Trichlorophenol
PESTICIDES	
D020	Chlordane
D012	Endrin
D031	Heptachlor
D013	Lindane (gamma-BHC)
D014	Methoxychlor
D015	Toxaphene
HERBICIDES	
D016	2,4-D
D017	2,4,5-TP (Silvex)

ATTACHMENT 2

Physical Characteristics of Waste

PARAMETER	SOURCE	TEST METHOD #
Color	ASTM	D4979
Incidental Odor	ASTM	D4979
Physical State	ASTM	D4979
Layers	ASTM	D4979
Specific Gravity	ASTM	D5057
Free Liquids	SW 846	9095
pH	ASTM	D4980
pH	ASTM	D4980
Flash Point, Closed Cup	ASTM	D93
Flash Point, Open Cup	ASTM	D92

Chemical Composition

Toxicity Characteristic Constituents D004 to D043 Compounds (Note 1)

WASTE CODE	CONSTITUENT	SOURCE	TEST METHOD #
	TCLP	SW 846	1311 (Note 2)
D029	1,1-Dichloroethylene	SW 846	8240, 8260
D028	1,2-Dichloroethane	SW 846	8240, 8260
D027	1,4-Dichlorobenzene	SW 846	8270
D041	2,4,5-Trichlorophenol	SW 846	8270
D042	2,4,6-Trichlorophenol	SW 846	8270
D016	2,4-D	SW 846	8150
D030	2,4-Dinitrotoluene	SW 846	8270
D023	2-Methylphenol (o-Cresol)	SW 846	8270
D024	3-Chlorophenol (m-Cresol)	SW 846	8270
D025	4-Methylphenol (p-Cresol)	SW 846	8270
D004	Arsenic	SW 846	6010,7060,7061
D005	Barium	SW 846	6010, 7080
D018	Benzene	SW 846	8240, 8260
D006	Cadmium	SW 846	6010, 7130, 7131
D019	Carbon tetrachloride	SW 846	8240, 8260
D020	Chlordane	SW 846	8080, 8081
D021	Chlorobenzene	SW 846	8240, 8260
D022	Chloroform	SW 846	8240, 8260
D007	Chromium	SW 846	6010, 7190, 7191
D026	Cresol	SW 846	8270
D012	Endrin	SW 846	8080, 8081
D031	Heptachlor and its epoxide	SW 846	8080, 8081
D033	Hexachloro-1,3-butadiene	SW 846	8270
D032	Hexachlorobenzene	SW 846	8270
D034	Hexachloroethane	SW 846	8270
D008	Lead	SW 846	6010, 7420, 7421
D013	Lindane	SW 846	8080, 8081

D009	Mercury	SW 846	7470, 7471
D014	Methoxychlor	SW 846	8080, 8081
D035	Methyl ethyl ketone (MEK)	SW 846	8240, 8260
D036	Nitrobenzene	SW 846	8270
D037	Pentachlorophenol	SW 846	8270
D038	Pyridine	SW 846	8270
D010	Selenium	SW 846	6010, 7740, 7741
D011	Silver	SW 846	6010, 7760
D017	Silvex (2,4,5-TP)	SW 846	8150
D039	Tetrachloroethylene	SW 846	8240, 8260
D015	Toxaphene	SW 846	8080, 8081
D040	Trichloroethylene	SW 846	8240, 8260
D043	Vinyl chloride	SW 846	8240, 8260

CONSTITUENT	SOURCE	TEST METHOD #
PCBs	SW 846	8080
Cyanide (screen)	ASTM	D5049
Cyanide (total)	SW 846	9010, 9012
Sulfide (screen)	ASTM	D4978
Sulfide (total)	SW 846	9030
Phenolics	SW 846	9065,9066, 9067

Note 1 The methods listed for the organic constituents are primarily GC/MS methods. SW-846 has a number of GC methods that are equally valid analytical tests for a number of these organic constituents.

Note 2 D004 to D043 constituents may be determined by performing method 1311 followed by analysis of the leachate or by total constituent analysis. If method 1311 is used, some states may require the lab to bias correct the data

ATTACHMENT 3: F039 CONSTITUENTS

CONSTITUENT	SOURCE	TEST METHOD #
1,1,1,2-Tetrachloroethane	SW 846	8240, 8260 (Note 1)
1,1,1-Trichloroethane	SW 846	8240, 8260
1,1,2,2-Tetrachloroethane	SW 846	8240, 8260
1,1,2-Trichloro-1,2,2-trifluoroethane	SW 846	8240, 8260
1,1,2-Trichloroethane	SW 846	8240, 8260
1,1-Dichloroethane	SW 846	8240, 8260
1,1-Dichloroethylene	SW 846	8240, 8260
1,2,3-Trichloropropane	SW 846	8240, 8260
1,2,4,5-Tetrachlorobenzene	SW 846	8270
1,2,4-Trichlorobenzene	SW 846	8270
1,2-Dibromo-3-chloropropane	SW 846	8240, 8260
1,2-Dibromoethane	SW 846	8240, 8260
1,2-Dichlorobenzene	SW 846	8270
1,2-Dichloroethane	SW 846	8240, 8260
1,2-Dichloropropane	SW 846	8240, 8260
1,2-Diphenylhydrazine	SW 846	8270
1,3-Dichlorobenzene	SW 846	8270
1,4-Dichlorobenzene	SW 846	8270
1,4-Dinitrobenzene	SW 846	8270
1,4-Dioxane	SW 846	8240, 8260
2,3,4,6-Tetrachlorophenol	SW 846	8270
2,4,5-T	SW 846	8150
2,4,5-Trichlorophenol	SW 846	8270
2,4,6-Trichlorophenol	SW 846	8270
2,4-D	SW 846	8150
2,4-Dichlorophenol	SW 846	8270
2,4-Dimethylphenol	SW 846	8270
2,4-Dinitrophenol	SW 846	8270
2,4-Dinitrotoluene	SW 846	8270
2,6-Dichlorophenol	SW 846	8270
2,6-Dinitrotoluene	SW 846	8270
2-Acetylaminofluorene	SW 846	8270
2-Chloro-1,3-butadiene	SW 846	8240, 8260
2-Chloronaphthalene	SW 846	8270
2-Chlorophenol	SW 846	8270
2-Methylphenol (o-Cresol)	SW 846	8270
2-Naphthylamine	SW 846	8270
2-Sec-Butyl-4,6-dinitrophenol	SW 846	8270
3-Chlorophenol (m-Cresol)	SW 846	8270
3-Chloropropylene	SW 846	8270
3-Methylcholanthrene	SW 846	8270
4,4-Methylene-bis-(2-chloroanaline)	SW 846	8270
4,6-Dinitro-2-methylphenol	SW 846	8270

4-Aminobiphenyl	SW 846	8270
4-Bromophenyl phenyl ether	SW 846	8270
4-Methylphenol (p-Cresol)	SW 846	8270
4-Nitrophenol	SW 846	8270
5-Nitro-o-Toluidine	SW 846	8270
Acenaphthalene	SW 846	8270
Acenaphthene	SW 846	8270
Acetone	SW 846	8240, 8260
Acetonitrile	SW 846	8240, 8260
Acetophenone	SW 846	8270
Acrolein	SW 846	8240, 8260
Acrylamide	SW 846	8270
Acrylonitrile	SW 846	8240, 8260
Aldrin	SW 846	8080
alpha-BHC	SW 846	8080
Aniline	SW 846	8270
Anthracene	SW 846	8270
Antimony	SW 846	6010, 7040, 7041
Aramite	SW 846	8270
Aroclor 1016	SW 846	8080
Aroclor 1221	SW 846	8080
Aroclor 1232	SW 846	8080
Aroclor 1242	SW 846	8080
Aroclor 1248	SW 846	8080
Aroclor 1254	SW 846	8080
Aroclor 1260	SW 846	8080
Arsenic	SW 846	6010, 7060, 7061
Barium	SW 846	6010, 7080
Benzene	SW 846	8240, 8260
Benzo(a)anthracene	SW 846	8270
Benzo(a)pyrene	SW 846	8270
Benzo(b)fluoranthene	SW 846	8270
Benzo(g,h,i)perylene	SW 846	8270
Benzo(k)fluoranthene	SW 846	8270
Beryllium	SW 846	6010, 7090, 7091
beta-BHC	SW 846	8080
Bis(2-chloroethoxy)methane	SW 846	8270
Bis(2-chloroehtyl)ether	SW 846	8270
Bis(2-chloroisopropyl)ether	SW 846	8270
Bis(2-ethylhexyl)phthalate	SW 846	8270
Bromodichloromethane	SW 846	8240, 8260
Bromomethane	SW 846	8240, 8260
Butyl benzyl phthalate	SW 846	8270
Cadmium	SW 846	6010, 7130, 7131
Carbon disulfide	SW 846	8240, 8260
Carbon tetrachloride	SW 846	8240, 8260
Chlordane	SW 846	8080

Chlorobenzene	SW 846	8240, 8260
Chlorobenzilate	SW 846	8270
Chlorodibromomethane	SW 846	8240, 8260
Chloroethane	SW 846	8240, 8260
Chloroform	SW 846	8240, 8260
Chloromethane	SW 846	8240, 8260
Chromium	SW 846	6010, 7190, 7191
Chrysene	SW 846	8270
Cis-1,3-dichloropropene	SW 846	8240, 8260
Copper	SW 846	6010, 7210
Cyanide (screen)	ASTM	D5049
Cyanide (total)	SW 846	9010, 9012
Cyclohexanone	SW 846	8240, 8260
delta-BHC	SW 846	8080
Di-n-butyl phthalate	SW 846	8270
Di-N-propyinitrosoamine	SW 846	8270
Dibenzo(a,e)pyrene	SW 846	8270
Dibenzo(a,h)anthracene	SW 846	8270
Dibromomethane	SW 846	8240, 8260
Dichlorodifluoromethane	SW 846	8240, 8260
Dieldrin	SW 846	8080
Diethyl phthalate	SW 846	8270
Dimethyl phthalate	SW 846	8270
Diphenylamine	SW 846	8270
Diphenylnitrosamine	SW 846	8270
Endosulfan I	SW 846	8080
Endosulfan II	SW 846	8080
Endosulfan sulfate	SW 846	8080
Endrin	SW 846	8080
Endrin aldehyde	SW 846	8080
Ethyl acetate	SW 846	8240, 8260
Ethyl cyanide	SW 846	8240, 8260
Ethyl ether	SW 846	8240, 8260
Ethyl methacrylate	SW 846	8240, 8260
Ethylbenzene	SW 846	8240, 8260
Ethylene oxide	SW 846	8240, 8260
Famphur	SW 846	8140
Fluoranthene	SW 846	8270
Fluorene	SW 846	8270
Fluoride	SW 846	Proposed 9056
Fluorotrichloromethane	SW 846	8240, 8260
gamma-BHC	SW 846	8080
Heptachlor	SW 846	8080
Heptachlor epoxide	SW 846	8080
Hexachloro-1,3-butadiene	SW 846	8270
Hexachlorobenzene	SW 846	8270
Hexachlorobutadiene	SW 846	8270

Hexachlorocyclopentadiene	SW 846	8270
Hexachlorodibenzo-furans	SW 846	8280, 8290
Hexachlorodibenzo-p-dioxins	SW 846	8280, 8290
Hexachloroethane	SW 846	8270
Hexachloropropene	SW 846	8270
Indeno (1,2,3-cd) pyrene	SW 846	8270
Iodomethane	SW 846	8240, 8260
Isobutyl alcohol	SW 846	8240, 8260
Isodrin	SW 846	8080
Isosafrole	SW 846	8270
Kepone	SW 846	8080
Lead	SW 846	6010, 7420, 7421
Lindane	SW 846	8080
Mercury	SW 846	7470, 7471
Methanol		No EPA method
Methapyrilene	SW 846	8270
Methoxychlor	SW 846	8080
Methyl ethyl ketone (MEK)	SW 846	8240, 8260
Methyl isobutyl ketone (MIBK)	SW 846	8240, 8260
Methyl methacrylate	SW 846	8240, 8260
Methyl methanesulfonate	SW 846	8270
Methyl parathion	SW 846	8140
Methylacrylonitrile	SW 846	8240, 8260
Methylene chloride	SW 846	8240, 8260
N-Butyl alcohol	SW 846	8240, 8260
N-Nitroso-di-N-butylamine	SW 846	8270
N-Nitrosodiethylamine	SW 846	8270
N-Nitrosoethylamine	SW 846	8270
N-Nitrosomethylethylamine	SW 846	8270
N-Nitrosomorpholine	SW 846	8270
N-Nitrosopiperidine	SW 846	8270
N-Nitrosopyrrolidine	SW 846	8270
Naphthalene	SW 846	8270
Nickel	SW 846	6010, 7520
Nitrobenzene	SW 846	8270
o,p'-DDD	SW 846	8080
o,p'-DDE	SW 846	8080
o,p'-DDT	SW 846	8080
p,p'-DDD	SW 846	8080
p,p'-DDE	SW 846	8080
p,p'-DDT	SW 846	8080
p-Chloro-m-cresol	SW 846	8270
p-Chloroanaline (4-chloroanaline)	SW 846	8270
p-Nitroanaline (4-nitroanaline)	SW 846	8270
Parathion	SW 846	8140
PCBs	SW 846	8080

Pentachlorobenzene	SW 846	8270
Pentachlorodibenzo-furans	SW 846	8280, 8290
Pentachlorodibenzo-p-dioxins	SW 846	8280, 8290
Pentachloronitrobenzene	SW 846	8270
Pentachlorophenol	SW 846	8270
Phenacetin	SW 846	8270
Phenanthrene	SW 846	8270
Phenol	SW 846	8270
Phenolics	SW 846	9065, 9066, 9067
Phorate	SW 846	8140
Phthalic anhydride	SW 846	8270
Pronamide	SW 846	8270
Pyrene	SW 846	8270
Pyridine	SW 846	8270
Safrole	SW 846	8270
Selenium	SW 846	6010, 7740, 7741
Silver	SW 846	6010, 7760
Silvex (2,4,5-TP)	SW 846	8150
Sulfide (screen)	ASTM	D4978
Sulfide (total)	SW 846	9030
Tetrachlorodibenzo-furans	SW 846	8280, 8290
Tetrachlorodibenzo-p-dioxins	SW 846	8280, 8290
Tetrachloroethylene	SW 846	8240, 8260
Thallium	SW 846	6010, 7840, 7841
Toluene	SW 846	8240, 8260
Toxaphene	SW 846	8080
Trans-1,2-Dichloroethene	SW 846	8240, 8260
Trans-1,3-Dichloropropene	SW 846	8240, 8260
Tribromomethane (Bromoform)	SW 846	8240, 8260
Trichloroethylene	SW 846	8240, 8260
tris-(2,3-Dibromopropyl) phosphate	SW 846	8270
Vanadium	SW 846	6010, 7910, 7911
Vinyl chloride	SW 846	8240, 8260
Xylenes	SW 846	8240, 8260
Zinc	SW 846	6010, 7950

Note 1: The method listed for the organic constituents are primarily GC/MS methods. SW-846 has a number of GC methods that are equally valid analytical tests for a number of these organic constituents.